

**Sheryl (Sherry) L. Herauf**  
Director  
Federal Regulatory Relations

1275 Pennsylvania Avenue, N.W., Suite 400  
Washington, D.C. 20004  
(202) 383-6424

**PACIFIC  TELESIS.**  
Group - Washington

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**March 22, 1993**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Donna R. Searcy**  
**Secretary**  
**Federal Communications Commission**  
**Mail Stop 1170**  
**1919 M Street, N.W., Room 222**  
**Washington, D.C. 20554**

**Dear Ms Searcy:**

**Re: CC Docket No. 93-5 Elimination or Revision of Certain Reporting Requirements  
under Part 43 of the Commission's Rules; Reports of Communication Common  
Carriers and Certain Affiliates**

**On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six  
copies of their "Comments" in the above proceeding.**

**Please stamp and return the provided copy to confirm your receipt. Please contact me  
should you have any questions or require additional information concerning this matter.**

**Sincerely,**



**Enclosures**

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

MAR 22 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Elimination or Revision of Certain  
Reporting Requirements under Part 43  
of the Commission's Rules, Reports of  
Communication Common Carriers and  
Certain Affiliates

CC Docket No. 93-5

COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell ("the Pacific Companies") respectfully comment on the Notice of Proposed Rulemaking in the above captioned proceeding.<sup>1</sup> The Pacific Companies support the Commission's proposal to eliminate Section 43.42, Report on pensions and benefits.<sup>2</sup> The Commission's action is consistent with the goals of its Regulatory Reform Program -- to eliminate any unnecessary regulatory burden and promote economic growth.

The recent development of accounting guidelines and specific reporting and disclosure requirements are chronicled by the NPRM.<sup>3</sup> Those developments offer additional opportunities

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<sup>1</sup> Elimination or Revision of Certain Reporting Requirements under Part 43 of the Commission's Rules, Reports of Communication Common Carriers and Certain Affiliates, CC Docket No. 93-5. Notice of Proposed Rulemaking, released February 2, 1993 ("NPRM").

<sup>2</sup> 47 C.F.R. §43.42.

<sup>3</sup> NPRM, paras. 3-8.

for the Commission to obtain and monitor the required information. We support the Commission's proposal to eliminate the filings required under Section 43.42 as a means to eliminate redundant and unnecessary reporting of details underlying the pensions and benefit plans. As pointed out in the NPRM, the Commission's need for data on carrier's pension costs can be satisfied by the information provided in the Automated Reporting Management Information System USOA Report 43-02, Table VIII and, if necessary, by specific data requests to carriers.

The Pacific Companies appreciate the Commission's efforts to reduce carriers' administrative burdens especially if, as is clear here, that can be accomplished without loss of Commission oversight. Eliminating a requirement to report redundant data will contribute to the ability of both the

Commission and carriers to put limited resources to more  
productive use.

Respectfully submitted,

PACIFIC BELL  
NEVADA BELL

*Lucille M. Mates*

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JAMES P. TUTHILL  
LUCILLE M. MATES

140 New Montgomery St., Rm. 1526  
San Francisco, California 94105  
(415) 542-7654

JAMES L. WURTZ

1275 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 383-6472